

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

MEMPHIS A. PHILLIP RANDOLPH  
INSTITUTE, *et al.*

*Plaintiffs,*

v.

TRE HARGETT, *et al.*

*Defendants.*

Civil No. 3:20-cv-0374  
JUDGE RICHARDSON  
MAGISTRATE JUDGE FRENSELY

**MOTION FOR PRELIMINARY INJUNCTION**

**PLEASE TAKE NOTICE** that, upon the annexed Declarations of Ravi Doshi; Dr. Arthur L. Reingold; Dr. Linton A. Mohammed, Gloria Sweet-Love, on behalf of the Tennessee State Conference of the NAACP; Jeffrey Lichtenstein, on behalf of the Memphis Central Labor Council; Kendra Lee, on behalf of the Memphis A. Philip Randolph Institute; Charlane Oliver, on behalf of The Equity Alliance; and Dawn Harrington, on behalf of Free Hearts, the exhibits attached thereto, the accompanying Memorandum of Law, and all other pleadings and proceedings in this action, Plaintiffs Memphis A. Phillip Randolph Institute (“APRI”), The Equity Alliance (“Equity Alliance”), Free Hearts, The Memphis and West Tennessee AFL-CIO Central Labor Council a/k/a the Memphis Central Labor Council (“MCLC”), and The Tennessee State Conference of the NAACP (“Tennessee NAACP”) (together, the “Organizational Plaintiffs”), together with Plaintiffs Sekou Franklin and Kendra Lee, (collectively, “Plaintiffs”), by and through their undersigned counsel, will, as soon as counsel may be heard, move this Court before the Honorable United States District Judge Eli Richardson for an Order preliminarily enjoining Defendants Tre Hargett, Mark Goins, and Amy Weirich, and granting the relief set forth

in Plaintiffs' accompanying proposed order and such other and further relief that the Court deems just and proper.

As set forth in detail in the Memorandum of Law, Plaintiffs are likely to succeed on the merits of each of their moved-on claims and will suffer irreparable harm absent relief. The balance of the equities moreover favors Plaintiffs. For these reasons, Plaintiffs are entitled to a preliminary injunction and request that the Court enter the proposed order submitted herewith.

Prior to the filing of this Motion, in accordance with Local Rule 7.01(a)(1), Plaintiffs' counsel advised Defendants' counsel of their intention to move for a preliminary injunction. Defendants' counsel indicated that they would oppose the Motion and requested relief.

Dated: June 12<sup>th</sup>, 2020

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, pursuant to Local Rule 5.01, that on this 12th day of June, 2020, the foregoing was served via the Court's CM/ECF filing system and by electronic mail on the following:

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